

ORIGINAL

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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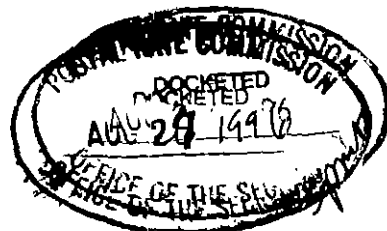
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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

SPECIAL SERVICES REFORM, 1996

Docket No. MC96-3

MOTION OF UNITED STATES POSTAL SERVICE FOR EXTENSION OF TIME TO
RESPOND TO INTERROGATORIES APWU/USPS-T8-12(E)
(August 27, 1996)

The United States Postal Service hereby moves for extension of time to respond to the American Postal Workers Union's interrogatory APWU/USPS-T8-12(e), filed August 13, 1996. Interrogatory APWU/USPS-T8-12(e) requests the mean, median, and mode weight for special delivery service mail matter for each year from 1970 through 1995. This interrogatory requires special SAS programming and computer runs for each of the four years for which data exists. Moreover, this interrogatory is one part of a lengthy, complicated interrogatory set that was filed at the very end of discovery. The Postal Service has not been able to complete the analysis and review needed to provide a response. Therefore, the Postal Service moves for extension of




time to file its response to this interrogatory until Friday, August 30.

Respectfully submitted,

UNITED STATES POSTAL SERVICE

By its attorneys:

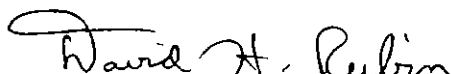
Daniel J. Foucheaux, Jr.
Chief Counsel, Ratemaking



David H. Rubin

CERTIFICATE OF SERVICE

I hereby certify that I have this day served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.



David H. Rubin

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August 27, 1996